

McGovern Legal Services, LLC
Marlena S. Diaz-Cobo, Esq.
850 Carolier Lane
North Brunswick, NJ 08902
Phone (732) 246-1221
Fax (732) 246-1872

ATTORNEYS FOR MOUNTAINVIEW AT GREEN BROOK CONDOMINIUM ASSOCIATION, INC.

In re:

STEVEN JONES

Debtor.

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
IN PROCEEDINGS UNDER CHAPTER 13
OF THE BANKRUPTCY CODE

CASE NO.: 22-11927-MBK

**LIMITED OBJECTION TO
CONFIRMATION OF DEBTOR'S
CHAPTER 13 PLAN**

Creditor, Mountainview at Green Brook Condominium Association, Inc. (the "Association"), by and through its counsel, McGovern Legal Services, LLC, hereby submits this limited objection to Debtor's plan of reorganization under Chapter 13 of the Bankruptcy Code.

The Association's objection includes, but is not limited to the following:

I. IT APPEARS THAT THE PROPOSED PLAN MAY NOT INCLUDE PAYMENT OF THE ASSOCIATION'S ENTIRE CLAIM.

Debtor's proposed Chapter 13 Plan fails to properly identify and treat the Association's entire \$28,236.96 claim. The Association's proof of claim was timely filed on March 25, 2022, with a secured claim of \$21,046.33 and a general unsecured claim of \$7,190.63.

The Debtor's Chapter 13 plan does propose to pay the Association its entire secured claim. However, the Debtor states in the proposed Plan that the only the secured portion will be paid through the Plan. Part 5 of the Debtor's proposed plan states that unsecured claims will

receive “Pro Rata distribution from any remaining funds.” The Association objects to the Plan only to the extent that it may preclude the Association from receiving Pro Rata distribution of any remaining funds towards its unsecured claim. The Association is unsure what is intended by the additional language of “secured portion only” so the Association is filing this objection out of an abundance of caution to ensure its unsecured claim is treated in the same manner as other general unsecured claims.

Respectfully submitted,
McGovern Legal Services, LLC

Date: June 20, 2022

By: /s/Marlana S. Diaz-Cobo
MARLENA S. DIAZ-COBO, ESQ.

CERTIFICATION OF SERVICE

I, Marlana S. Diaz-Cobo, Esq., certify and state that this document was served upon the individuals and/or entities listed below by electronic mail on June 20, 2022. I am aware that if any of the statements made herein are willfully false, I am subject to punishment.

Respectfully submitted,
McGovern Legal Services, LLC

Date: June 20, 2022

By: /s/Marlana S. Diaz-Cobo
MARLENA S. DIAZ-COBO, ESQ.

SERVICE LIST

Via Electronic Service:

CLERK, UNITED STATES BANKRUPTCY COURT
402 East State Street
Trenton, NJ 08608
Telephone: 609-989-2200

STEVEN JONES
c/o Bruce C. Truesdale, PC
147 Union Avenue, Suite 1E
Middlesex, NJ 08846

TRUSTEE
Albert Russo
CN4853
Trenton, New Jersey 08650

U.S. TRUSTEE
US Dept of Justice
Office of the US Trustee
One Newark Center Ste 2100
Newark, NJ 07102